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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**LETTER RE: PREPARATION FOR
HIGH WIND SEASON AND
NUMBER OF FIRES (GREATER OR
EQUAL TO 10 ACRES IN SIZE)**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company ("PG&E") respectfully submits this
letter in response to the Court's September 17, 2019, request for information regarding PG&E's

1 preparation for high wind season and the number of fires in PG&E's service territory ten acres or
2 greater allegedly caused by PG&E's equipment.

3 **I. PG&E Is Preparing for Northern California's High Wind Season**

4 PG&E is continuing to work aggressively to further strengthen its programs and
5 infrastructure to maximize safety and mitigate the potential wildfire risk. To that end, PG&E has
6 implemented several additional measures designed to address the risk of wildfires as a result of an
7 increased likelihood that parts of its service territory will experience drier, higher-speed winds in the
8 coming months.

9 The first component of PG&E's preparation for high-wind season is its vegetation
10 management program. As the Court is aware, vegetation contact with PG&E's power lines is the
11 leading source of electric involved fire incidents in PG&E's service territory given the enormous
12 number of trees with the potential to contact PG&E's overhead lines. (*See* Dkt. 976 at 56; Dkt. 1016
13 at 2.) To address this potential risk, PG&E has developed a comprehensive, multi-pronged
14 vegetation management program designed to, among other things, maintain vegetation clearances
15 and abate potentially hazardous trees (the routine program), address risks associated with the drought
16 and tree mortality emergency declarations and resultant directives (the "CEMA" program) and
17 proactively conduct tree work that reduces the likelihood of tree failure that could impact electric
18 facilities and pose a public safety risk (the Public Safety & Reliability (the "PS&R") program).

19 As discussed with the Court at the September 17, 2019, conference, in addition to
20 PG&E's routine, CEMA and PS&R vegetation management programs, in late 2018, PG&E began
21 performing enhanced vegetation management ("EVM") in Tier 2 and Tier 3 High Fire Threat
22 District ("HFTD") areas. (*See generally* Dkt. 1091.) PG&E's EVM program goes well beyond
23 applicable state and federal regulations and is performed in addition to PG&E's historical and
24 ongoing vegetation management work. The program requires: enhanced clearance requirements (12
25 feet of radial clearance around conductors, even though only 4 feet of clearance is required by
26
27

regulation),¹ overhang clearing (pruning to maintain conductor-to-sky clearance within a zone extending 4 feet on either side of conductors, even though applicable regulations permit overhangs) and high-risk tree work (identifying trees tall enough to potentially strike power lines and addressing those that fail a risk-informed tree analysis, even though applicable regulations require removal of only “[d]ead trees, old decadent or rotten trees, [and] trees weakened by decay or disease”). PG&E forecasted that its EVM program would cover 2,455 line miles in 2019. As of September 21, PG&E had completed identified work on approximately 760 line miles.

PG&E’s ability to complete inspection and clearance of the 2,455 line miles forecasted for 2019 is dependent on its ability to significantly increase the number of qualified personnel engaged in the EVM effort. PG&E is in the process of hiring the additional personnel needed and will continue to monitor the retention process to confirm its resource needs are being met. In addition, as PG&E stated in its Wildfire Safety Plan, the ability to complete the 2019 line miles target to be cleared will depend on various factors including vegetation density, topography, access and environmental considerations. (Dkt. 1004-1 at 75-76.) Moreover, until PG&E inspects the lines, the number of trees that require trimming or removal, which is unknown, could impact the rate at which lines can be cleared. (*Id.* at 76.)

The second component of PG&E’s preparation for high-wind season includes measures designed to make its equipment more fire resistant and/or less likely to experience failure. These measures include PG&E’s Wildfire Safety Inspection Program (“WSIP”), an enhanced inspection program based on an evaluation of key failure modes of transmission and distribution assets in Tier 2 and Tier 3 HFTD and nearby areas. Under the WSIP, PG&E accelerated inspections of transmission, distribution and substation assets in Tier 2 and Tier 3 HFTD areas. These accelerated inspections focused on conditions that could lead to potential fire ignitions and supplement PG&E’s baseline inspection and maintenance procedures. Under the plan, PG&E performed detailed ground inspections and climbing inspections (for towers) that focus on failure

¹ CPUC rules recommend pruning to 12 feet to ensure the 4-foot minimum is maintained throughout the year, and the EVM program is intended to adhere to this recommendation.

1 points capable of visual inspection as well as secondary inspections using drones or helicopters with
2 high resolution imagery for all transmission assets. The inspections were followed by quality
3 reviews designed to properly identify and prioritize any necessary repair work. In addition, Tier 2
4 and Tier 3 HFTD area inspections were designed to identify sag and clearance issues for correction
5 through re-sagging or the installation of spreader brackets, as well as any other conditions that could
6 lead to line slap in areas susceptible to fire for its distribution assets.

7 PG&E is substantially complete with these enhanced inspections and expects to
8 complete inspections of the remaining few assets as expeditiously as possible. PG&E has inspected
9 all 694,250 poles on distribution overhead lines. As of September 21, 2019, of the 49,760 poles on
10 transmission lines, PG&E has inspected approximately 49,695. PG&E also completed 49,461 out of
11 49,760 visual inspections of transmission towers. As of May 8, 2019, PG&E has inspected all
12 transmission assets either visually or by drone or helicopter with high resolution imagery. PG&E
13 has completed 100 percent of the repairs to conditions that presented hazards requiring immediate
14 repair.

15 Finally, PG&E has also been expanding its Public Safety Power Shutoff (“PSPS”)
16 program, which proactively de-energizes a portion of its electric system in the interest of public
17 safety when there are forecasts of gusty winds and dry conditions combined with a heightened fire
18 risk. Beginning with the 2019 wildfire season, PG&E has expanded its PSPS program to include all
19 electric lines, both distribution and transmission, that pass through HFTD areas. After each PSPS
20 event, PG&E evaluates the response to identify areas of improvement and then integrates any
21 lessons learned into its PSPS processes.

22 As PG&E stated to the Court at the September 17, 2019, conference, PG&E expects
23 to de-energize more in 2019 than it did last year. In June 2019, PG&E conducted one PSPS event in
24 two locations on the same weekend, affecting approximately 22,000 customers. In addition, just six
25 days after appearing before Your Honor, on September 23, 2019, PG&E de-energized certain
26 distribution and transmission lines in Butte, Yuba and Nevada counties, affecting approximately
27 22,000 customers. The following day, PG&E de-energized again in seven different counties: Butte,

1 Napa, Nevada, Placer, Plumas, Sonoma and Yuba. This de-energization affected approximately
 2 48,000 customers. Following the de-energization, PG&E crews visually inspected approximately
 3 2,785 miles of power lines to assess whether they were free from damage and safe to re-energize and
 4 performed repairs on any damaged locations prior to safely restoring service. PG&E was able to
 5 restore power to all customers less than 24 hours after the weather conditions indicating a potential
 6 fire risk existed had passed.

7 As of September 4, 2019, PG&E has installed more than 160 sectionalizing devices
 8 that allow PG&E to limit the geographical impact of de-energization as well as accelerate the
 9 restoration process. PG&E is also working with the California Independent System Operator
 10 (“CAISO”) to determine how to best minimize impacts on the interconnected electric grid if PG&E
 11 needs to turn off high-voltage transmission lines for public safety. Additionally, as of September 30,
 12 2019, PG&E has installed over 600 new weather stations in HFTD areas to provide more detailed
 13 inputs into its weather models. More geographically granular weather data enables PG&E to more
 14 accurately pinpoint regions forecast to experience PSPS conditions, reducing the number of
 15 customers in-scope for de-energization.²

16 **II. PG&E’s Equipment May Have Contributed to Nine Fires of 10 Acres or Greater in** 17 **2019**

18 The California Public Utilities Commission (“CPUC”) requires investor-owned
 19 utilities to submit an annual report of all fire-related “reportable events”, which meet the following
 20 conditions: “(a) A self-propagating fire of material other than electrical and/or communication
 21 facilities, [where] (b) [t]he resulting fire traveled greater than one linear meter from the ignition
 22 point, and (c) [t]he utility has knowledge that the fire occurred”. CPUC Decision 14-02-015. PG&E
 23

24
 25 ² PG&E knows how much its customers rely on electric service and the impacts of these events
 26 on families, businesses and communities—including the use of medical equipment. PG&E
 27 understands and appreciates that turning off the power affects first responders and the operation of
 critical facilities, communications systems and much more. PG&E will only consider proactively
 turning off power when the benefits of de-energization outweigh potential public safety risks.

therefore compiles data about these incidents, including the potential cause of the ignition, for annual submission to the CPUC.

PG&E's analysis of these events is ongoing and the information below represents PG&E's current understanding of the potential cause of each of the following fires. As of September 17, 2019, PG&E's equipment may have contributed to nine ignitions in 2019 that resulted in fires ten acres or greater. The potential causes of those nine ignitions were:

- Vegetation: two ignitions
- Equipment: one ignition
- Third-party: five ignitions (three of which involved animal contact with lines and two of which involved vehicular contact with lines)
- Unknown: one ignition³

Respectfully Submitted,

Dated: October 1, 2019

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³ PG&E does not know what caused this ignition, which ignited on September 1, 2019, and therefore it is possible that PG&E equipment may not be involved. Cal Fire is currently investigating this fire. *See* California Department of Forestry & Fire Protection, Jolon Fire, General Information *available at* <https://fire.ca.gov/incidents/2019/9/1/jolon-fire>.

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